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**FISHER & PHILLIPS LLP**  
300 S Fourth Street, Suite 1500  
Las Vegas, Nevada 89101

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUGREEN LIMITED PARTNERSHIP, ) Case No.: 3:23-CV-00292-LHR-CSD  
Plaintiff, )  
vs. ) **ORDER GRANTING  
STIPULATION TO EXTEND  
THE STAY ON PROCEEDINGS**  
FARRUKH SOHAIL and BLOOMSGREEN,)  
LLC, )  
Defendants. )  
FARRUKH SOHAIL, )  
Counterclaimant, )  
vs. )  
TRUGREEN LIMITED PARTNERSHIP, )  
Counterdefendant. )

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1 Plaintiff/Counterdefendant TruGreen Limited Partnership (“TruGreen” or  
2 “Plaintiff”), Defendant BloomsGreen, LLC (“BloomsGreen”) and  
3 Defendant/Counterclaimant Farrukh Sohail (“Sohail”) (BloomsGreen and Sohail  
4 collectively referred to as “Defendants”), by and through their attorneys of  
5 record, hereby submit this Joint Status Report and Stipulation and Order to  
6 Extend the Stay on Proceedings.

7 1. On September 18, 2023, the parties entered their Discovery Plan  
8 and Scheduling Order Pursuant to Fed. R. Civ. P. 26(f)(3) and LR 26-1, and  
9 requested this Court stay further proceedings in this matter until December 15,  
10 2023, or until they have exhausted their mediation efforts, whichever occurs later.  
11 The Court heard and approved the parties’ proposed Discovery Plan and  
12 Scheduling Order requesting special scheduling on September 28, 2023.

13 2. On November 21, 2023, the parties submitted a stipulation for an  
14 extension of time on the stay on the proceedings in this matter until January 26,  
15 2024, or until they have exhausted their mediation and settlement efforts,  
16 whichever occurs later. On November 27, 2023, the Court granted the parties  
17 stipulation and ordered that a status report be filed either jointly or separately by  
18 the parties on or before January 26, 2024, informing the Court of the status of the  
19 mediation efforts or include a briefing schedule for Plaintiff’s pending Motion to  
20 Dismiss.

21 3. Since mid-November 2023, the parties have actively engaged in  
22 meaningful settlement discussions without a mediator and have made significant  
23 progress toward reaching a realistic and anticipated resolution regarding this  
24 matter. The parties have agreed, in principle, to almost a complete resolution of  
25 this matter. The parties are down to only one issue that remains but are actively  
26 working on resolving that issue and anticipate it will be resolved in the next  
27 fourteen (14) days or sooner. The remaining issue involves a modification to  
28

1 Defendant BloomsGreen's logo. On January 22, 2024, Defendant BloomsGreen  
 2 provided Plaintiff TruGreen with several "mockups" of BloomsGreen's proposed  
 3 logo. TruGreen is currently reviewing those mockups and will respond back to  
 4 Defendant BloomsGreen shortly.

5       4. In the event that this final issue cannot be resolved, the parties  
 6 have tentatively scheduled a potential mediation with Richard Sankovitz. Should  
 7 this matter not be amicably resolved first, the parties are prepared to promptly  
 8 move forward with private mediation. However, the parties believe there is a  
 9 high likelihood that this case will be fully and finally resolved within the next  
 10 fourteen (14) days.

11       5. Wherefore, because the parties believe that they may be able to  
 12 resolve this matter without incurring additional expenses through mediation and  
 13 anticipate being able to submit a stipulation for dismissal within 14 days, they  
 14 request an extension of time on the stay on the proceedings in this matter until  
 15 February 8, 2024. Should it be required, the parties will proceed with mediation  
 16 prior to briefing Plaintiff's pending Motion to Dismiss and prior to engaging in  
 17 formal discovery.

18       6. The foregoing constitutes good cause for the extension of time.

19 DATED this 25th day of January, 2024.

20 **THE GILMORE LAW GROUP, PLLC    FISHER & PHILLIPS LLP**

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21 *Attorneys for Plaintiff/Counter-defendant*

22 IT IS SO ORDERED:

23   
24 LARRY R. HICKS  
25 UNITED STATES DISTRICT JUDGE

26 DATED this 29<sup>th</sup> day of January, 2024.  
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